

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**DAVID TYLER MOSS AND
BRANDON KEATING**

Plaintiffs,

**MARKO PRINCIP, Individually,
MARKO PRINCIP d/b/a VIDEOGAMES
YOUTUBE CHANNEL, MARKO
PRINCIP d/b/a ACHIEVEMENT GUIDE,
MARKO PRINCIP d/b/a GAME GUIDE,
LLC, VIDEOGAMES YOUTUBE
CHANNEL, AND BRIAN MARTIN**

Defendants.

Civil Action No. 3:14-cv-03088-M

MOTION FOR EXTENSION OF TIME ON DEFENDANTS'

RESPONSE TO ENTRY OF JUDGMENT AND PERMANENT INJUNCTION

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, MARKO PRINCIP and BRIAN MARTIN (collectively herein after "Defendants") and files this, their Motion for Extension of Time on Defendants' Response to Entry of Judgment and Permanent Injunction, and for cause of action would respectfully show the Court as follows:

1. On April 7, 2016, Defendants' former Counsel filed their Motion for Withdrawal of Counsel wherein they notified the newly retained Counsel for Defendants regarding the deadline for Defendants' Response to Entry of Judgment and Permanent Injunction which is April 8, 2016, at 4:00 p.m.

2. Therefore, Defendants respectfully request to extend their deadline to file any and all necessary responses to pending post-trial motions, as well as to prepare and file any post-trial

motions on Defendants' behalf to Monday, April 25, 2016. This motion is necessitated by the fact counsel was just retained in this matter, and require adequate time to obtain the trial record, review it, and then prepare and file the necessary papers.

3. While Plaintiffs risk no prejudice whatsoever, Defendants Princip and Keating are aged 23 and 33 respectfully, and received an adverse jury verdict for fraud in excess of \$20 Million. Defendants' rights and futures are at stake; and the newly retained Counsel for Defendants need the time to adequately represent these two young men. Justice and fairness require us to do no less, and we respectfully ask the Court to grant this motion to avoid the substantial prejudice that would befall the Defendants if the undersigned was forced to respond in a hasty or accelerated fashion.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that the Court extend Defendants' response deadline to Monday, April 25, 2016 until 11:59 p.m., and, for such other and further relief that Defendants may be justly awarded.

Respectfully submitted,

FRIEDMAN & FEIGER, LLP

/s/ Mazin A. Sbaiti

By: _____

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

This shall certify that the undersigned personally conferred with Counsel for Plaintiff, regarding the merits of this motion. Counsel for Plaintiff opposed to the relief requested.

/s/ Mazin Sbaiti
Attorney

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2016, I electronically filed the foregoing document with the Clerk of Court for the U.S. District Court for the Northern District of Texas, Dallas Division, using the electronic case filing system of the Court. The electronic case filing system will send a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept the Notice as service of this document by electronic means.

/s/ Mazin Sbaiti
Attorney